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Attorneys for Defendants
JOHN PAPPAS, III, PM CORPORATE GROUP, INC, and
DOME PRINTING AND PACKAGING, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

R.R. DONNELLEY & SONS COMPANY,
a Delaware corporation,

Plaintiff,

vs.

JOHN PAPPAS, III, an individual,
MERILIZ INC., dba DOME PRINTING,
PM CORPORATE GROUP, INC., DOME
PRINTING AND PACKAGING, LLC, and
DOES 1-10, inclusive,

Defendants.

Case No.: 2:21-cv-00753-DJC-AC

**STIPULATION AND ~~PROPOSED~~ ORDER
ALLOWING CONTINUED FILING OF
JOINT STATEMENTS RE DISCOVERY
DISAGREEMENT**

Complaint Filed: April 26, 2021
Trial Date: January 13, 2025

STIPULATION AND PROPOSED ORDER

Plaintiff R.R. Donnelley and Sons Company (“Plaintiff”), on the one hand, and Defendants PM Corporate Group, inc. and Dome Printing and Packaging, LLC (the “PM Defendants”) on the other hand (collectively the “Parties”), hereby stipulate as follows:

1. Defendant filed a motion to compel, Dkt No. 145 (“Motion to Compel”) on December 20, 2023, with a hearing date of January 10, 2024 and the Joint Statement re Discovery Disagreement due on December 27, 2023.

2. On December 20, 2023, Counsel for Plaintiff requested an extension to draft Plaintiff’s portion of the joint statement in light of the upcoming holidays and Plaintiff’s counsel’s unavailability. Plaintiff previously granted Defendants a similar extension in light of the Thanksgiving Holiday. Defendants desire to provide the same extension of time to complete the briefing of the Motions to Compel.

3. The Parties thereafter came to the following agreement to which they now stipulate:

A. The parties shall file the Joint Statement re Discovery Disagreement with the Court by January 3, 2024, seven days before the hearing scheduled for January 10, 2024.

B. Plaintiff reserves all rights to challenge the Motion to Compel as untimely.

SO STIPULATED.

Dated: December 27, 2023

GAVRILOV & BROOKS

/s/Matthew R. Richard

J Edward Brooks

Matthew Richard

Michael S. Wilcox

Attorneys for Defendants

JOHN PAPPAS, III,

PM CORPORATE GROUP, INC, and

DOMES PRINTING AND PACKAGING, LLC

Dated: December 27, 2023

LITTLER MENDELSON P.C.

/s/Derek S. Hecht*

Mark A. Romeo

Derek S. Hecht

Attorneys for Plaintiff

R.R. Donnelley & Sons Company

*with permission on 12/27/2023

IT IS SO ORDERED.

DATED: January 3, 2024



ALLISON CLAIRE

UNITED STATES MAGISTRATE JUDGE